

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

In Re:)
MOORE MEDICAL CENTER, LLC) BK-06-12867-WV
Debtors.) Chapter 7

APPLICATION FOR APPROVAL OF EMPLOYMENT OF EIDE BAILLY, LLP
AS ACCOUNTANTS TO DEBTOR AND BRIEF IN SUPPORT

Douglas Gould, Trustee, hereby respectfully applies to the Court pursuant to 11 U.S.C. §328(a) and Fed. R. Bankr. P. 2014(a) for approval of the Trustee's employment of the accounting firm of Eide Bailly, LLP ("Eide Bailly") as accountants to the Trustee, effective as of the date of this Application (the "Application") for the limited purpose of assisting the Trustee in the preparation of CHAMPUS reports. In support of this Application, the Trustee would show the Court as follows:

1. The Debtor filed its voluntary petition under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") on October 28, 2006 (the "Petition Date") in the United States Bankruptcy Court for the Western District of Oklahoma.
2. The case was converted to Chapter 7 and the Chapter 7 Trustee was appointed on June 6, 2007.
3. Trustee requires the services of an accountant to assist the Trustee in preparing Moore Medical Center CHAMPUS Reports.
4. The Trustee wishes to employ Eide Bailly as its agent because of that company's experience and qualifications to render the services described above. Eide Bailly's offices are located at 1601 N.W. Expressway, Oklahoma City, Oklahoma 73118.
5. The Trustee believes that Eide Bailly does not hold or represent any interest adverse to the Debtor or the Debtor's bankruptcy estate and that Eide Bailly is a "disinterested

person" as defined in 11 U.S.C. § 101(14). Attached hereto as Exhibit "A" in support of the Application is the Affidavit of Richard D. Wagner (the "Affidavit"), who is the partner of Eide Bailly.

6. Based on the Affidavit of Richard D. Wagner it is the Trustee's understanding that Eide Bailly has no connection with the above-captioned Debtor, its creditors, equity security holders, other parties-in-interest (as reasonably known) or its respective attorneys, except as disclosed in the supporting Affidavit.

7. The Trustee and Eide Bailly have agreed to enter into an Agreement for Eide Bailly to prepare the CHAMPUS Reports for a flat fee of \$7,500.00 each, plus out-of-pocket expenses.

8. Final approval and allowance of Eide Bailly's fees and expenses will be subject to application and approval by this Court pursuant to the standard set forth in Bankruptcy Code §328 and in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules corresponding local rules, prior order of this Court and guidelines established by the Office of the United States Trustee.

WHEREFORE, the Trustee respectfully requests that the Court enter an Order substantially in the form attached hereto authorizing the Trustee to employ Eide Bailly as accountants for Trustee for the purposes set forth above, effective as of the date hereof and grant such further relief as is just and proper.

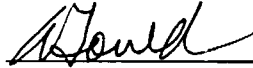
Dated this ____ day of August, 2007.



Douglas N. Gould, OBA #3500
Douglas N. Gould, P.L.C.
210 Park Avenue, Suite 2050
Oklahoma City, Oklahoma 73102
Telephone: (405) 319-1717
Facsimile: (405) 416-0014
Attorneys for Trustee

CERTIFICATE OF SERVICE

This is to certify that service of the foregoing document was effected through Electronic Notice for Registered Participants and, unless an alternative means of service is set forth below, has been sent by United States Mail, first class postage prepaid, to the parties listed on the Limited Service List attached hereto on this 2nd day of August, 2007.

A handwritten signature in black ink, appearing to read "D. Gould", is written over a horizontal line.

DOUGLAS N. GOULD

EXHIBIT "A"

IN THE UNITED STATES BANKRUPTCY COURT
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AFFIDAVIT OF RICHARD D. WAGNER IN SUPPORT
OF TRUSTEE'S APPLICATION TO EMPLOY EIDE BAILLY, LLP

Richard D. Wagner, FHFMA, CPA, of the firm Eide Bailly, LLP, ("Eide Bailly") states
as follows:

1. I am a partner of Eide Bailly, LLP, and I am authorized to make this statement on its behalf.
2. I submit this affidavit in support of the application ("Application") filed by Douglas Gould ("Trustee") seeking to retain Eide Bailly as accountants for the limited purpose of preparing the Debtor's CHAMPUS Reports in compliance with applicable CHAMPUS rules and regulations.
3. For its services to the Trustee, Eide Bailly will charge the Trustee a flat fee of \$7,500.00 per report, plus direct out-of-pocket expenses.
4. Final approval and allowance of Eide Bailly's fees and expenses will be subject to application and approval by this Court pursuant to the standard set forth in Bankruptcy Code §328(a), and in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, corresponding local rules, prior orders of this Court, and guidelines established by the Office of the United States Trustee.
5. Eide Bailly reviewed the Debtor's Schedules and Matrix and reports that it has the following connections with these entities:

On or about November 8, 2006, Eide Bailly was retained as accountants to the Debtors in the jointly administered bankruptcy cases of TSG, Inc., et al., currently pending before the United States Bankruptcy Court for the Eastern District of Oklahoma as Case No. 06-80899. TSG, Inc. formerly served as the Debtor's manager.

6. It is possible that Eide Bailly has represented other entities who are creditors or parties-in-interest in this case. However, Eide Bailly believes that in each case, Eide Bailly's representation of any such entity was on matters unrelated to the Debtor.

7. To the best of the undersigned's knowledge and belief, Eide Bailly has no connection with parties with interests adverse to the Debtor's bankruptcy estate that would be material to its ability to represent the Trustee for the Debtor under the provisions of the Bankruptcy Code. After consultation with the Trustee, Eide Bailly further believes that it is a "disinterested person" as that term is defined in §101(14) of the Bankruptcy Code.

EIDE BAILLY, LLP.

By: Richard D. Wagner

Richard D. Wagner

State of Oklahoma)
)ss
County of Oklahoma)

Subscribed and sworn to before me this 2 day of August, 2007

Joan Knight
Notary Public

My Commission Expires:

December 1, 2010



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FOR THE WESTERN DISTRICT OF OKLAHOMA

In Re:)
MOORE MEDICAL CENTER, LLC) BK-06-12867-WV
Debtors.) Chapter 7

OFFICIAL LIMITED SERVICE LIST AS OF JULY 31, 2007

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Chapter 7 Trustee

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Secured Creditors and their Counsel

HCI Secured Medical Receivables

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